

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

UNITED STATES OF AMERICA,	No. 18-04066-01-CR-C-BCW
Plaintiff,	COUNTS 1-2 18 U.S.C § 922(d)(1) NMT 10 Years Imprisonment NMT \$250,000 Fine NMT 3 Years Supervised Release Class C Felony
v.	
VICTOR NAHUM VARGAS, [DOB: 05/04/1978]	
Defendant.	COUNT 3 18 U.S.C § 922(a)(6) NMT 10 Years Imprisonment NMT \$250,000 Fine NMT 3 Years Supervised Release Class C Felony
	\$100 Special Assessment (each Count)

S U P E R S E D I N G I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

COUNT 1
(Knowingly Sold a Firearm to a Felon)
18 U.S.C. § 922(d)(1)

On or about April 18, 2018, within Cole County, in the Western District of Missouri, and elsewhere, the defendant, **VICTOR NAHUM VARGAS**, knowingly sold five (5) firearms to a person, knowing and having reasonable cause to believe, that such person had been convicted of a crime punishable by imprisonment for a term exceeding one year, all in violation of Title 18, United States Code, Sections 922(d)(1), and 924(a)(2).

COUNT 2
(Knowingly Sold a Firearm to a Felon)
18 U.S.C. § 922(d)(1)

On or about May 11, 2018, within Cole County, in the Western District of Missouri, the defendant, **VICTOR NAHUM VARGAS**, knowingly sold eleven (11) firearms to a person, knowing and having reasonable cause to believe, that such person had been convicted of a crime punishable by imprisonment for a term exceeding one year, all in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

COUNT 3
(False Statement to Acquire a Firearm)
18 U.S.C. § 922(a)(6)

On or about May 9, 2018, in Cole County, in the Western District of Missouri, the defendant, **VICTOR NAHUM VARGAS**, in connection with his acquisition of firearms, that is, a Sig Sauer, Model P266, .40 caliber semi-automatic pistol, serial number UU627309; a Glock, Model 22, .40 caliber semi-automatic pistol, serial number STT684; a Glock, Model 19, .40 caliber semi-automatic pistol, serial number XXF524; a Glock, Model 22, .40 caliber semi-automatic pistol, serial number STT689; a Glock, Model 22, .40 caliber semi-automatic pistol, serial number IM3645PD; a Glock, Model 22, .40 caliber semi-automatic pistol, serial number ZUZ369; a Glock, Model 22, .40 caliber semi-automatic pistol, serial number TCP183; a Glock, Model 21, .45 caliber semi-automatic pistol, serial number KAK165; and a Smith & Wesson, Model M & P 9, 9mm semi-automatic pistol, serial number DWY6987; each from River City Pawn & Gun, a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code, knowingly made a false and fictitious written statement which was intended and likely to deceive River City Pawn & Gun with respect to a fact material to the lawfulness of the sale of the firearms to the defendant

under Chapter 44 of Title 18, in that the defendant represented on a Bureau of Alcohol, Tobacco and Firearms Form 4473 that he was the actual transferee/buyer of the firearms, when, in fact, he was acquiring each firearm on behalf of another person, all in violation Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

A TRUE BILL.

/S/ Samie Hill

FOREPERSON OF THE GRAND JURY

/S/ Lawrence E. Miller

Lawrence E. Miller

Assistant United States Attorney
Missouri Bar No. 35931

Dated: 10/24/2018